

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	
Trina Walker-Savage	:	Case No.: 18-15481(JKF)
	:	
Debtor (s)	:	Chapter 13

EXPEDITED MOTION TO INCUR NEW DEBT

Trina Walker-Savage hereinafter referred to as “Debtor” moves this Honorable Court for an Order Allowing Debtor to Incur New Debt and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about August 17, 2018.
2. The Chapter 13 filing was assigned case number 18-15481(JKF).
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about January 9, 2019.
4. Debtor is desirous of purchasing the real property with her daughters known as and located at 332 East Olive Street, Westville, NJ 80093, hereinafter referred to as “the property.”
5. On or about May 17, 2020, Debtor was approved for a mortgage to purchase property in the amount of \$165,000.00. A true and correct copy of the letter of approval is attached here and labeled as “**Exhibit A.**”
6. On or about May 18, 2020, Debtor entered into an agreement of sale to purchase the property in the amount of \$165,000.00. A true and correct copy of the Agreement of Sale is attached hereto and labeled as “**Exhibit B.**”
7. An expedited hearing is humbly requested here because the settlement date for the purchase of the subject property is scheduled for June 30, 2020.

8. In consideration thereof, Debtor requests this Honorable court to enter an order allowing her to incur new debt to finance and purchase the property.

9. Debtor's Chapter 13 plan is a 100% plan and she is current on payments to the Trustee.

10. Lastly, Debtor will amend her Schedule J to show that her Chapter 13 Plan payment remains feasible after the purchase of the property.

WHEREFORE, the Debtor requests an Order allowing her to incur new debt to finance the purchase of the real property located at 332 East Olive Street, Westville, NJ 08093.

Dated: June 15, 2020

/s/Brad J. Sadek, Esq
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